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July 24, 1989

JEFFREY C. BATES
(617) 570-1499

BY HAND

Mr. Tim Conway
Office of Regional Counsel
U.S. Environmental Protection Agency
JFK Federal Building
Boston, MA 02203

Re: Residential Indoor Air Sampling Results:
Wells G&H Superfund Site

Dear Tim:

I thought you might be interested in the enclosed letter report I have received from Dr. Rudolph J. Jaeger and Dr. D. Warner North, stating their view that the concentrations reported for the "target compounds" in the above-referenced indoor air monitoring study "do not present a significant risk to human health and ... are below applicable federal regulatory guidelines ...." In case she might be interested as well, I am forwarding a copy of the enclosed letter to Mary Kay Voytilla under cover of a copy of this letter.

Dr. Jaeger is a board-certified toxicologist who teaches toxicology at New York University and Harvard and who has served as a consultant to EPA, OSHA, ATSDR and WHO. Dr. North is a co-author of the well-known text entitled Risk Assessment In The Federal Government, teaches at Stamford and has served as a member of EPA's Science Advisory Board for many years, where he has been Vice-Chairman of the Board's Environmental Health Committee.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Jeffrey C. Bates

JCB/ab
CC: By Hand
Ms. Mary Kay Voytilla
w/enclosure
XP-1598/u

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July 20, 1989

Jeffrey C. Bates, Esq.
Goodwin, Procter & Hoar
Exchange Place
Boston, MA 02109-2881

Dear Jeff:

We have reviewed the data from the indoor air monitoring study recently conducted by EPA and ENSR in Woburn. Our conclusions regarding the potential risks that might be presented by the concentrations reported for the "target compounds" are as follows:

1. The concentrations detected do not present a significant risk to human health and the concentrations detected are below applicable federal regulatory guidelines, even making the conservative presumption that two of the compounds detected, tetrachloroethene and trichloroethene, may present a carcinogenic hazard under some circumstances.

2. The target compound concentrations detected also are within the range commonly detected in indoor air in homes and occupational settings across the country.

3. With particular regard to the concentrations detected at UniFirst and W.R. Grace, we note that, at the time of sampling, the buildings were largely unoccupied and ventilation was at a minimum. We further note that the target compound concentrations detected were several orders of magnitude below the recently established OSHA standards.

Finally, one of us (Jaeger) had previously investigated the basis for the Ambient Air Level (AAL) for tetrachloroethene, which has been published by the Massachusetts DEQE, with the individual who originally calculated the cancer potency estimate. He is Dan Guth who is now with the USEPA in North Carolina. Jaeger notes that there appear to be differences between the values used by MA DEQE and the USEPA. From the discussion, Dr. Jaeger was given to understand that Dr. Guth now believes that the EPA cancer potency estimate, as a basis for an indoor air standard, is more correct than the stated DEQE value and he informs Dr. Jaeger that the EPA derivation is appropriate for use in assessing any presumed carcinogenic risk for tetrachloroethene.

We would be happy to discuss these matters with representatives of EPA, the Massachusetts Department of Public Health and ATSDR should they wish to do so.

Sincerely,

Rudolph J. Jaeger, Ph.D., DABT, REA (CA)

D. Warner North, Ph.D.